

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA,)	CRIMINAL ACTION NO.
)	
)	
v.)	3:21-CR-00323-N
)	
MICHAEL DAVID CARROLL)	
)	
)	
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**DEFENDANT’S MOTION TO CONTINUE
SENTENCING**

Comes Now the Defendant, MICHAEL DAVID CARROLL, and Requests additional time to prepare for sentencing. Scheduling conflicts, health concerns with Covid quarantine, as well as the recent National Lockdown has delayed the ability to FULLY prepare for sentencing with Defendant and necessary witnesses.

Defendant requests a 21-day continuance of his sentencing to March 21, 2022. Should that requested date not be available, it should be noted that I am unavailable March 3-11, March 28-30, April 11, or April 19.

Further, the AUSA is unavailable March 10, March 30, April 22, and April 27.

This request is not for the purpose of delay.

Respectfully submitted,

By: /s/ Christopher K. Woodward
Christopher K. Woodward
Texas State Bar No. 24003645

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Attorney for Defendant
MICHAEL DAVID CARROLL

CERTIFICATE OF SERVICE

I, Christopher K. Woodward, certify that on the date shown below, a true and correct copy of the foregoing Motion was filed with the Court, the Assistant United States Attorney, and the United State Probation Department via CM/ECF delivery.

Date: 2/20/2022

By: /s/ Christopher K. Woodward
Christopher K. Woodward

Attorney for Defendant
MICHAEL DAVID CARROLL

CERTIFICATE OF CONFERENCE

I, Christopher K. Woodward, certify that in compliance with the Local Rule, a conference on the attached motion was held via EMAIL Communication on 2/19/2022 between Counsel listed and the Assistant United States Attorney ("AUSA") assigned to the case. During the conference, it was determined that: **AUSA is unopposed.**

By: /s/Christopher K. Woodward
Christopher K. Woodward